

Sport Pilot NPRM Comment

I am submitting this comment to the Sport Pilot NPRM as an active hang glider pilot under CFAR Part 103. I am also the Vice President / Treasurer of the Capital Hang Gliding & Paragliding Association (CHGPA), a local group in the Washington, D.C. area which is Chapter 13 of the United States Hang Gliding Association (USHGA).

I applaud the direction that the FAA is proposing to move with the Sport Pilot and Sport Aircraft proposal. The goals of improving the safety of recreational aviation and increasing the availability of light aircraft flying to a broader range of the public are most appropriate. However, the NPRM as currently written will have the effect on the Part 103 flying community of actually reversing the trend of improved safety in recent years, and simultaneously reducing the number of potential recreational pilots. I am confident this perverse affect was never the intent of the drafters of the NPRM.

Safety Concern.

Hang gliding has over thirty years progressed from a do-it-yourself form of trial and error aviation, with many costly errors, to a mature self-regulated sport. Today we have a notably effective system of training standards and certified instructors. One significant improvement in the training process, with concomitant improved safety for hang gliding students at all skill levels, has been the use of tandem flight instruction. The proposals in the Sport Pilot NPRM could easily lead to the abolition of tandem flight in hang gliders. Losing such a tremendously effective and safe teaching technique will surely decrease, rather than increase, the overall safety of training hang glider pilots.

Accessibility Concern.

At one time hang gliding was limited to seashore and mountainous areas in the country. The development of aerotow techniques for hang gliding has brought this sport to a much wider range of geography, in many more States. Vital, active commercial aerotow hang gliding air parks and businesses serve regions such as central Florida, the Eastern Shore of Maryland, the flat farmlands of Tidewater Virginia and eastern Ohio. All across the country aerotow launch operations, whether formal businesses or cooperative clubs have made light aircraft flight in hang gliders and ultralight sailplanes available to a much broader cross section of the population. The Sport Pilot proposal would specifically prohibit the use of light sport aircraft for towing objects. If this prohibition takes effect, all of these aerotow operations will be closed. Thousands of potential pilots will be denied access to this dynamic sport.

Besides the fact that aerotow launching of hang gliders and ultralight sailplanes has extended access to flight geographically, it has also extended accessibility to a number of physically limited pilots. The training and flight experiences of Michelle Cook at Wallaby Ranch near Orlando (<http://www.wallabyranch.com/articles/michelle.html>) demonstrate clearly the power of ultralight aerotow to extend the joy of recreational flight to an otherwise limited portion of the population.

Access and Safety Synergy.

The combination of tandem instruction and aerotow launching has resulted in faster, safer entry into flight for hundreds, maybe thousands of pilots. Loss of both tandem flight instruction and aerotow launches will reduce the access and safety of our freest form of flight, our least expensive form of recreational flight.

Suggested changes to the Sport Pilot NPRM.

Keeping in mind the concerns of safety and accessibility, I strongly recommend several changes to the Sport Pilot NPRM.

First, clearly state that tandem flight is and will continue to be available for properly certified instructors and pilots.

Second, provide for the use of light sport aircraft to tow piloted hang gliders and other ultralight aircraft operating under Part 103 for the purpose of launching those aircraft. This should be allowed for both instruction and for general flight operations. It would be proper to specify that only properly licensed Sport Pilot certificate holders certified for flight towing could participate in this activity. Further, only Sport Aircraft certified for towing could be used.

Third, provide for a category of Sport Aircraft pilot that is allowed to operate an aerotow aircraft for hire, both for instructional purposes and for general flight operations. The many aerotow hang gliding businesses must combine paid flight instruction and general flight operations towing properly certified pilots in order to remain commercially viable.